

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:16CR224
	:	
Plaintiff,	:	
	:	JUDGE PATRICIA A. GAUGHAN
-vs-	:	
	:	
RADU MICLAUS,	:	<b><u>MOTION FOR RELEASE OF</u></b>
	:	<b><u>PRIVATE AND SEALED DOCUMENTS</u></b>
Defendant.	:	<b><u>TO COUNSEL</u></b>

On December 17, 2019, this Court issued an order appointing the Office of the Federal Public Defender to represent the Defendant for purposes of appeal. Undersigned counsel, Catherine Adinaro Shusky, has been assigned to represent Mr. Miclaus. In order to effectively represent Mr. Miclaus on appeal, counsel requests access to all sealed and private documents related to Mr. Miclaus. These documents include: R. 113, Sealed Motion in Limine; R. 133, Sealed Opinion; R 178, Government's Sentencing Memorandum; and R. 188, PSR.

Respectfully submitted,

STEPHEN C. NEWMAN  
Federal Public Defender  
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/s/ Catherine Adinaro Shusky  
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